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U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

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COUNT THREE

The Grand Jury further charges that:

Beginning on or about 2013, the exact beginning date is unknown to the Grand Jury, up to and including July 20, 2014, in Saint Louis County, within the Eastern District of Missouri,

DONALD SCHULZ,

the Defendant herein, having been convicted previously of a felony crime punishable by a term of imprisonment exceeding one year under the laws of the State of Missouri, did knowingly and intentionally possess one or more firearms; to wit: a Hi-Point make, C9 model, nine millimeter semi-automatic pistol bearing serial number P1750331 which traveled in interstate or foreign commerce prior to being in the defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOUR

The Grand Jury further charges that:

Beginning on or about 2013, the exact beginning date is unknown to the Grand Jury, up to and including July 20, 2014, in Saint Louis County, within the Eastern District of Missouri,

DONALD SCHULZ,

the Defendant herein, having been convicted previously of a felony crime punishable by a term of imprisonment exceeding one year under the laws of the State of Missouri, did knowingly and intentionally possess one or more firearms; to wit: (i) a Jennings make, .22 caliber semi-automatic pistol with an altered serial number; (ii) a Smith and Wesson make, model MP, .223 caliber rifle bearing serial number SP07914; and (iii) a Volunteer Enterprise, Inc. make, model Commando Mark Three, .45 caliber rifle bearing serial number 05214, all of which traveled in interstate or foreign commerce prior to being in the defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1).

A TRUE BILL.

RICHARD G. CALLAHAN
United States Attorney

FOREPERSON

THOMAS REA, #53245MO
Assistant United States Attorney